ATTACHMENT A

Declaration of Allison T. Willoughby

- My name is Allison T. Willoughby. I am currently President of Brandenburg Telecom, LLC. My responsibilities include, among other matters, managing the federal activities including the preparation and filing of data for the National Broadband Map, assessing the competitive nature of the markets, analyzing the results of the Connect America Cost Model, and overseeing the mapping of exchange boundaries.
- 2. The purpose of this Declaration is to respond to Windstream's served-to-unserved challenge of Brandenburg Telecom's census block(s) listed in accompanying Form 505. Given that the census blocks fall in areas Brandenburg Telecom already provides voice and broadband service, the census blocks identified in the accompanying FCC Form 505 should be deemed as served counter to Windstream's serve-to-unserved challenge, and should not be included on the list of areas eligible for CAF Phase II support.
- 3. Brandenburg Telecom's Response is based upon the information ascertained and verified from our internal personnel. I personally oversaw and reviewed the preparation and analysis of the following:
 - a. Brandenburg Telecom prepared network maps (that plot the service nodes and location of all of the serviceable addresses-current and past customer's service addresses) located within Brandenburg Telecom's area along with superimposing the boundaries of the challenged census blocks.
 - b. Customer bills were extracted and reviewed to verify that Brandenburg Telecom does have current or past customers that receive voice and/or broadband service at the addresses within these census blocks. Due to the privacy issues associated with customer's bills (CPNI considerations) and the concern voiced by the FCC Bureau, it was determined not to file a copy of the actual customer bills even if redacted. I, however, do attest that bills and records exist showing that current or past customers have received voice and/or broadband service at the addresses located within these census blocks.
 - c. Advertising materials were reviewed and verified that voice and broadband service offerings are currently being offered in the locations where these census blocks are located. Pricing materials were reviewed and verified that

the rates for voice and broadband services in these census blocks are below the urban voice and broadband benchmarks. (See Attachment C for advertising materials.)

4. <u>CONCLUSION</u>: As these network maps depict, these census blocks fall within areas that are served by Brandenburg Telecom. Also, Brandenburg Telecom provides voice and broadband service in these census blocks at the required speeds and performance measures, and can provision voice and broadband services to these customers in the required timeframes. Given these facts, the FCC Form 505 should be deemed as served counter to Windstream's serve-to-unserved challenge, and should not be included on the list of areas eligible for CAF Phase II support.

I declare that the foregoing is true to the best of my knowledge, information and belief.

Allison T. Willoughby

President

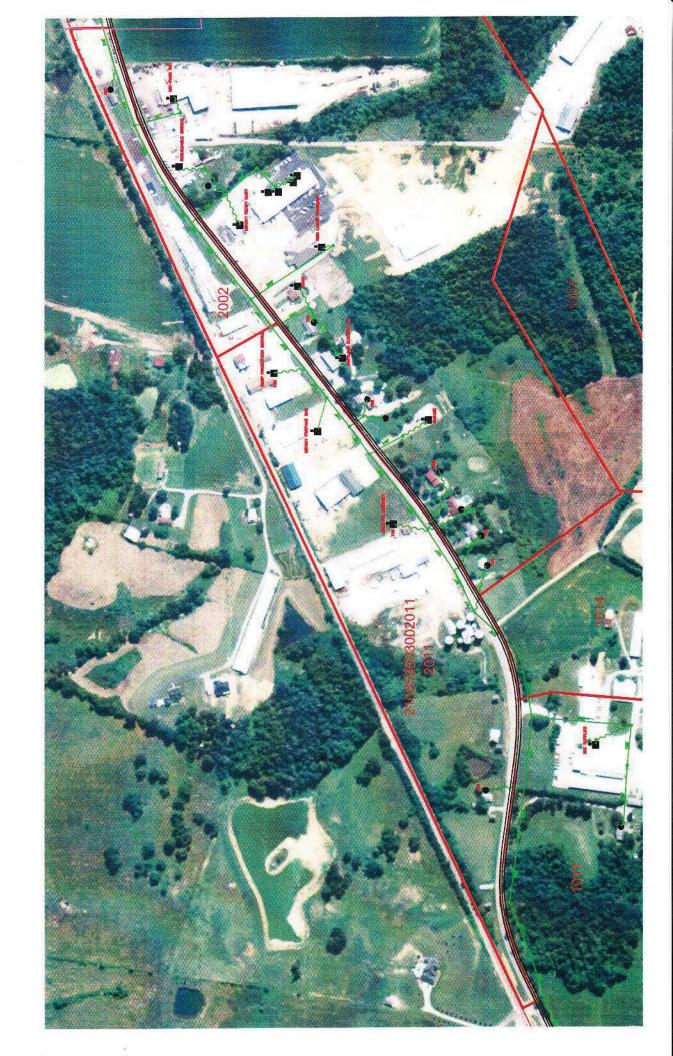
Dated: ///7//4

Attachment B

Network Plant Maps

The enclosed network plant maps plot the service nodes and serviceable addresses for the census blocks that are subject of this filing.











ATTACHMENT C

Advertising Materials

The enclosed advertising material is a screenshot from Brandenburg Telecom's website and is advertised in local media outlets for the areas that are the subject of this filing. The material highlights the service offering of basic phone and high-speed broadband service to the census blocks.

